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**UNITED STATE DISTRICT COURT**

**DISTRICT OF NEVADA**

ASTRID LEMUS ORELLANA; MIRIAM  
 ORDONEZ,

Case No.: 2:23-cv-00767-RFB-DJA

Plaintiffs,

THE CHURCH OF JESUS CHRIST OF  
 LATTER-DAY SAINTS dba DESERET  
 INDUSTRIES; DOE EMPLOYEES I  
 through XX; DOES I through XX; inclusive  
 and ROE BUSINESS ENTITIES I through  
 XX, inclusive.

**STIPULATION AND ORDER TO  
 EXTEND DISCOVERY**

**(First Request)**

Defendant.

Defendant The Church of Jesus Christ of Latter-day Saints, a Utah corporation sole (Defendant) and Plaintiffs Astrid Lemus Orellana and Miriam Ordonez (Plaintiffs) hereby stipulate to extend the remaining discovery and pretrial deadlines by 60 days. This is the parties' first request to extend the deadlines.

**I. CURRENT DEADLINES.**

The following are the current deadlines:

| <b>CURRENT DEADLINE</b> | <b>EVENT</b>  |
|-------------------------|---|
| 09/14/2023              | Deadline for Initial Expert Disclosures   |
| 10/16/2023              | Deadline for Rebuttal Expert Disclosures  |
| 11/13/2023              | Close of Discovery  |
| 12/13/2023              | Deadline for Dispositive Motions  |
| 01/12/2024              | Deadline for the Joint Pretrial Order (the filing of a dispositive motion will suspend the joint pre-trial order deadline until 30 days after a decision on the motion or until otherwise ordered by the court) |

1 **II. DISCOVERY CONDUCTED TO DATE.**

2 To date, the parties have exchanged disclosures. Defendant has propounded written  
3 discovery on Plaintiffs. Defendant is in the process of scheduling independent medical  
4 examinations of Plaintiffs.

5 **III. DESCRIPTION OF THE REMAINING DISCOVERY.**

6 The parties wish to disclose experts, serve additional written discovery and subpoenas duces  
7 tecum, and depose additional nonparty witnesses and experts.

8 **IV. REASONS FOR EXTENDING THE DEADLINES.**

9 LR 26–3 states the following, in relevant part:

10 A motion or stipulation to extend any date set by the discovery plan,  
11 scheduling order, or other order must, in addition to satisfying the  
12 requirements of LR IA 6-1, be supported by a showing of good cause for  
13 the extension. A motion or stipulation to extend a deadline set forth in a  
14 discovery plan must be received by the court no later than 21 days before  
15 the expiration of the subject deadline. A request made within 21 days of  
16 the subject deadline must be supported by a showing of good cause. A  
17 request made after the expiration of the subject deadline will not be granted  
18 unless the movant also demonstrates that the failure to act was the result of  
19 excusable neglect.

20 Defendant wishes to extend all deadlines by 60 days because they cannot meet the current initial  
21 expert disclosure deadline. Defendant needs to obtain Plaintiff Astrid Orellana’s brain MRIs and  
22 other images and inspect the subject vehicle. One of Defendant’s consultants lives out of state, and  
23 he needs more time to conduct his investigation and prepare his initial expert report. Defendant  
24 immediately asked Plaintiffs to extend the pretrial deadlines once they became aware of the need  
25 for the additional time by the consultant. Plaintiffs graciously agreed to a 60-day extension.

26 **IV. PROPOSED EXTENDED DEADLINES.**

27 The parties propose extending the deadlines as follows:

| 28 PROPOSED<br>EXTENDED<br>DEADLINE | CURRENT<br>DEADLINE | EVENT                                    |
|-------------------------------------|---------------------|--|
| 11/13/2023                          | 09/14/2023          | Deadline for Initial Expert Disclosures  |
| 12/15/2023                          | 10/16/2023          | Deadline for Rebuttal Expert Disclosures |

| PROPOSED<br>EXTENDED<br>DEADLINE | CURRENT<br>DEADLINE | EVENT   |
|----------------------------------|---------------------|---|
| 01/12/2024                       | 11/13/2023          | Close of Discovery  |
| 02/12/2024 <sup>1</sup>          | 12/13/2023          | Deadline for Dispositive Motions  |
| 03/12/2024                       | 01/12/2024          | Deadline for the Joint Pretrial Order (the filing of a dispositive motion will suspend the joint pre-trial order deadline until 30 days after a decision on the motion or until otherwise ordered by the court) |

IT IS SO STIPULATED.

DATED this August 4, 2023.

MCNUTT LAW FIRM. P.C.

/s/ Matt Wolf

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*Counsel for Defendant*

DATED this August 4, 2023.

LADAH LAW FIRM

/s/ Joseph Chu

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Las Vegas, Nevada 89101  
*Counsel for Plaintiffs*

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: August 7, 2023

<sup>1</sup> This date would be extended to February 11<sup>th</sup>, however, that is a Sunday.